

# EXHIBIT B

MICK S. GREWAL, SR.\*<sup>a</sup>  
DAVID S. MITTLEMAN  
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**GREWAL LAW** PLLC  
ATTORNEYS AT LAW  
ALSO LICENSED IN DC\*, IL<sup>a</sup>

RICO D. NEAL  
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MICHAEL SZPARAGA

November 7, 2024

Sydney Crawford  
2226 Hunt Club Drive  
Bloomfield Hills, MI 48304-2300

**VIA FIRST CLASS MAIL**

Re: ***Our Client: Kathleen Droba***  
***DOI: February 19, 2023***

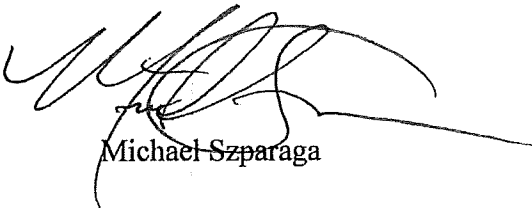
Dear Sydney Crawford:

Enclosed please find a Summons, Complaint and Order for Alternate Service.

Please turn this over to your insurance company.

Very truly yours,

Grewal Law PLLC



Michael Szparaga

MS/aeey  
ENC.

**STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM**

**KATHLEEN DROBA,**

Plaintiff,

v.

**SYDNEY CRAWFORD,**

Defendant.

Case No. 24- 725 - NI

Honorable WILLIAM C. ...

Michael D. Szparaga (P80373)  
Gurrajan Gill (P80511)  
GREWAL LAW PLLC  
Attorneys for Plaintiff  
345 E. Cady Street, 3<sup>rd</sup> Floor  
Northville, MI 48167  
(517) 393-3000  
[mszparaga@4grewal.com](mailto:mszparaga@4grewal.com)

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St, 3<sup>rd</sup> Floor  
Northville, MI  
48167

There is no other pending or resolved civil action arising out of the  
same transaction or occurrence alleged in this Complaint.



Michael D. Szparaga (P80373)

**COMPLAINT**

NOW COMES Plaintiff Kathleen Droba, by and through her attorneys, GREWAL  
LAW, PLLC, and for the General Allegations of this Complaint, states as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Kathleen Droba ("Plaintiff") is a resident of Franklin County, Pennsylvania.
2. Defendant Sydney Crawford ("Defendant"), at all times relevant herein, was a  
resident of Oakland County, Michigan.

3. The incident which is the subject matter of this Complaint occurred in Ingham County, Michigan.

4. Venue in Ingham County, Michigan is proper. MCL 600.1627; MCL 600.1629(1)(d).

5. This Honorable Court has general personal jurisdiction over Defendant in this action. MCL 600.701.

6. The amount in controversy exceeds the sum of Twenty-Five Thousand (\$25,000.00) Dollars.

#### **GENERAL ALLEGATIONS**

7. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

8. On or about February 19, 2023, MSU Spartans Women's Ice Hockey- Division II Team hosted an American Collegiate Hockey Association ("ACHA") club hockey match against the Adrian Bulldogs Women's Ice Hockey Team at Munn Ice Arena, located on Michigan State University campus in East Lansing, Michigan.

9. On the date of incident, Plaintiff was a student at Adrian College and a member of the Adrian Bulldogs Women's Ice Hockey Team.

10. On the date of incident, upon information and belief, Defendant was an undergraduate student at Michigan State University and member of the MSU Spartans Women's Ice Hockey- Division II Team.

11. At approximately 03:51 during the second period of the match, Plaintiff was positioned near the Spartan net, and Defendant was skating across the ice towards Plaintiff.

  
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12. Defendant continued to skate towards Plaintiff and, without warning, recklessly and/or carelessly and violently struck Plaintiff with the force of her entire body (commonly referred to as a "bodycheck"), causing Plaintiff to strike the surface of the ice with great force and lose consciousness.

13. The bodycheck by Defendant was not attributable to participation in the ongoing athletic contest, as there was no play on the puck, and such action is clearly and expressly outside of the rules of play.

#### **COUNT I – NEGLIGENCE**

14. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

15. Defendant owed Plaintiff, as her co-participant in athletic competition, a duty to conform her conduct to the normal bounds of the activity and refrain from reckless misconduct.

16. Defendant breached this duty by failing to conform her conduct to the normal bounds of the sport of women's ice hockey and forcefully bodychecking Plaintiff causing injuries set forth in further detail below.

17. Under the rules governing the February 19, 2023, athletic contest established by the NCAA and ACHA, bodychecking is expressly prohibited in women's ice hockey.

18. Defendant's actions exceeded the normal bounds of conduct associated with women's ice hockey.

19. Defendant, under the facts and circumstances presented, created a dangerous situation, which a reasonable participant in athletic competition should have known was dangerous.

  
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20. Defendant's negligent and reckless conduct during the hockey match between Adrian Women's Ice Hockey and MSU Women's Ice Hockey caused and contributed to Plaintiff's injuries.

21. As a direct and proximate result of the negligence of Defendant, Plaintiff was seriously injured, sustaining injuries including, but not limited to: (1) compression fractures in T10 and T11 spinal vertebrae; (2) persistent headaches; (3) nausea; (4) vertigo; (5) lightheadedness; (6) loss of balance; (7) memory loss; (8) bowel/bladder control issues; (9) impaired cognitive ability; (10) mood swings; (11) decreased quality of life; (12) increased difficulty with activities of daily living; (13) mental pain and anxiety; (14) psychological harm and injury (15) past, present, and future pain and suffering as a direct and proximate result of the injuries sustained; and (16) past, present, and future medical treatment.

22. Plaintiff's injuries may have activated and/or aggravate any latent and/or preexisting conditions.

23. As a result of the aforementioned injuries, Plaintiff has suffered, continues to suffer, and will in the future suffer, wage loss and impairment to her earning capacity and wages due to limitations caused by the subject incident.

24. Upon information and belief, as a further direct and proximate result of Defendant's actions and omissions, Plaintiff has suffered pain, disability, mental anguish, medical expenses, other damages that will be discovered during the course of litigation.

**WHEREFORE** Plaintiff makes a claim for all non-economic and economic losses for an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00). Further, Plaintiff asserts a claim for any amount that she may be entitled to, plus costs and interests and

  
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for whatever amount this Honorable Court may deem just and proper and the nature of this case may allow.

Respectfully Submitted:

**GREWAL LAW, PLLC**



Michael D. Szparaga (P80373)  
Attorney for Plaintiff  
345 E. Cady St., 3<sup>rd</sup> Floor  
Northville, MI 48167  
517-393-3000  
[mszparaga@4grewal.com](mailto:mszparaga@4grewal.com)

Dated: September 5, 2024



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<b>STATE OF MICHIGAN</b> <b>JUDICIAL DISTRICT</b> 30TH <b>JUDICIAL CIRCUIT</b> <b>COUNTY</b>	<b>ORDER REGARDING</b> <b>ALTERNATE SERVICE</b>	<b>CASE NO. and JUDGE</b> 24-725-NI Hon. Wanda Stokes
<b>Court address</b> 313 W Kalamazoo St., Lansing, MI 48933		<b>Court telephone no.</b> (517) 483-6103
<b>Plaintiff's name, address, and telephone no.</b> KATHLEEN DROBA  <b>Plaintiff's attorney, bar no., address, and telephone no.</b> MICHAEL D. SZPARAGA (P80373) GREWAL LAW PLLC 345 E. CADY ST., 3RD FLOOR NORTHVILLE, MI 48167	v	<b>Defendant's name, address, and telephone no.</b> SYDNEY CRAWFORD 2226 HUNT CLUB DR. BLOOMFIELD HILLS, MI 48304

**THE COURT FINDS:**

- ☒ 1. Service of process upon the defendant, SYDNEY CRAWFORD, cannot reasonably be made as provided in ☒ MCR 2.105 ☐ MCR 2.107(B)(1)(b) and service of process may be made in a manner that is reasonably calculated to give the defendant actual notice of the proceedings and an opportunity to be heard.

**IT IS ORDERED:**

- ☒ 2. Service of the ☒ summons and complaint ☐ other: \_\_\_\_\_ and a copy of this order shall be made by the following method(s).
- ☒ a. First-class mail to 2226 HUNT CLUB DR., BLOOMFIELD HILLS, MI 48304.
- ☒ b. Tacking or firmly affixing to the door at 2226 HUNT CLUB DR., BLOOMFIELD HILLS, MI 48304.
- ☐ c. Delivering at \_\_\_\_\_ to a member of the defendant's household who is of suitable age and discretion to receive process, with instructions to deliver it promptly to the defendant.
- ☐ d. Other: \_\_\_\_\_

For each method used, proof of service must be filed promptly with the court.

- ☐ 3. The motion for alternate service is denied.

WANDA M. STOKES 10/29/24  
 Judge signature and date



Approved, SCAO		Original - Court 1st copy - Defendant	2nd copy - Plaintiff 3rd copy - Return
<b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT 30th JUDICIAL CIRCUIT Ingham COUNTY	<b>SUMMONS</b>	<b>CASE NO.</b> 24- 725 -NI	
Court address 313 W. Kalamazoo St., Lansing, MI 48933		Court telephone no. 517-483-6500	
Plaintiff's name, address, and telephone no. KATHLEEN DROBA		Defendant's name, address, and telephone no. SYDNEY CRAWFORD	
Plaintiff's attorney, bar no., address, and telephone no. Michael D. Szparaga (P80373) Gurrajan Gill (P80511) Grewal Law PLLC 345 E. Cady St., 3rd Floor Northville, MI 48167 (517) 393-3000		v	

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

#### Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

#### Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☒ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

#### SUMMONS

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

- You are being sued.
- YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
- If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
- If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date <b>SEP 10 2024</b>	Expiration date <b>DEC 10 2024</b>	Court clerk <i>Alison J. Thudger</i>
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Summons (3/23)

Case No. 24- -NI

**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE OF SERVICE / NONSERVICE**

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	TOTAL FEE
\$		\$	\$

Signature

Name (type or print)

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) on Date and time

Signature on behalf of

Name (type or print)